## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

E. ALLEN REEVES, INC.

1145 York Road

Abington, Pennsylvania 19001,

CIVIL ACTION

NO: 3:10-CV-01393-JAP-TJB

Plaintiff,

v.

JURY TRIAL DEMANDED

MICHAEL GRAVES & ASSOCIATES,

INC.

341 Nassau Street

Princeton, New Jersey 08540,

Defendant.

APPLICATION FOR CLERK'S ORDER EXTENDING TIME TO ANSWER OR OTHERWISE MOVE WITH RESPECT TO MICHAEL GRAVES & ASSOCIATES' SECOND AMENDED THIRD PARTY COMPLAINT

Pursuant to Local Rule of Civil Procedure 6.1(b), Plaintiff, E. Allen Reeves, Inc. ("Reeves"), by and through its undersigned counsel, hereby applies for a fourteen (14) day extension of time to answer or otherwise move with respect to Michael Graves & Associates, Inc.'s ("Graves") Second Amended Third Party Complaint.

On August 27, 2010, Graves filed its Second Amended Third Party Complaint and served the same on Reeves by way of the Court's Electronic Filing System. Reeves' response to Graves' Counterclaim is currently due on Friday, September 10, 2010. Reeves respectfully requests a fourteen (14) day extension of time to answer or otherwise move with respect to Graves' Second Amended Third Party Complaint, through and including Friday, September 24, 2010. Reeves has not made any previous requests for extensions pursuant to Local Rule 6.1(b).

Respectfully submitted,

Cohen Seglias Pallas Greenhall & Furman, PC

Date: September 8, 2010

By: /s/ John J. Graham, Jr., Esquire
Jason A. Copley, Esquire
John J. Graham, Jr., Esquire
Attorneys for E. Allen Reeves, Inc.

AND NOW, this day of September, 2010, IT IS ORDERED that E. Allen
Reeves, Inc. ("Reeves") is granted a fourteen (14) day extension to answer or otherwise move
(including motions to dismiss) with respect to Michael Graves & Associates, Inc.'s ("Graves")
Second Amended Third Party Complaint. Reeves' answer or motion with respect to Graves'
Second Amended Third Party Complaint shall be filed on or before September 24, 2010.

## **CERTIFICATION OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Application for Clerk's

Order Extending Time to Answer or Otherwise Move with Regard to Graves' Second Amended

Third Party Complaint was served by electronic filing and facsimile on September 8, 2010 upon:

John H. Osorio, Esquire Raymond J. Michaud, Esquire MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN 200 Lake Drive East, Suite 300 Cherry Hill, NJ 08002

John E. Lamastra, Esquire
DALY LAMASTRA & CUNNINGHAM
3 Mountain View Road
P.O. Box 1622
Warren, NJ 07061

Kevin M. Bothwell, Esquire
THOMPSON, BECKER & BOTHWELL, LLC
10 Melrose Avenue
Woodcrest Pavilion
Suite 100
Cherry Hill, NJ 08003

Joanna P. Piorek
WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER, LLP
33 Washington Street
Newark, NJ 07102

By: /s/ John J. Graham, Jr., Esquire John J. Graham, Jr., Esquire Attorneys for E. Allen Reeves, Inc.